

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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FRANK QUAGLIA,  
:

Plaintiff,

: Civil Action No. 04-10460 RWZ

-against-

BRAVO NETWORKS, NATIONAL  
BROADCASTING COMPANY, INC., doing  
business as NBC; RAINBOW  
PROGRAMMING HOLDINGS, INC., and  
DOES 1-10,

: **DEFENDANT RAINBOW MEDIA  
HOLDINGS LLC'S MOTION FOR  
LEAVE TO FILE FACSIMILE COPY OF  
DECLARATION OF JOHN HUFFMAN**

Defendants.  
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Defendant Rainbow Media Holdings LLC, sued herein as Rainbow Programming Holdings, Inc. ("Rainbow"), hereby moves for leave to file a facsimile copy of the Declaration of John Huffman, submitted in support of Rainbow's Response to Plaintiff's Motion to Compel. As grounds for its motion, Rainbow states as follows:

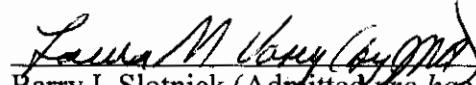
1. Rainbow is today filing its Response to Plaintiff Frank Quaglia's Motion to Compel.
2. Rainbow is filing the Declaration of John Huffman in support of its response to plaintiff's Motion to Compel in order to explain what financial information exists that is responsive to one of plaintiff's document requests.
3. Because Mr. Huffman is in New York, it was not possible to receive the original of his Declaration in Boston before today's filing deadline. The original is being delivered to Rainbow's local counsel in Boston, however, and will be promptly filed with the Court. In the meantime, Rainbow seeks leave to file a facsimile copy of the executed original today so that its

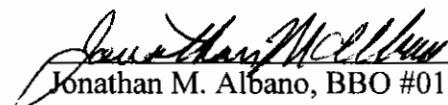
filings will be complete and to file the original of the Declaration immediately upon its receipt by local counsel.

WHEREFORE, Rainbow Media Holdings LLC respectfully requests that its motion for leave to file a facsimile copy of the Declaration of John Huffman, submitted in support of Rainbow's Response to Plaintiff's Motion to Compel, be allowed by the Court.

**RAINBOW MEDIA HOLDINGS LLC (sued  
herein as RAINBOW PROGRAMMING  
HOLDINGS, INC.)**

By its attorneys,

  
Barry I. Slotnick (Admitted *pro hac vice*)  
Laura M. Vasey (Admitted *pro hac vice*)  
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**BINGHAM McCUTCHEN**  
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Boston, Massachusetts 02110  
(617) 951-8000

Dated: June 14, 2005

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document  
was served upon the attorney of record for each other  
party by mail-hand on 6/14/05  
